

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

FREDERICK THOMAS,
Defendants.

CASE NO.: 2:17-CR-00306-JCM-VCF
ORDER GRANTING
FREDERICK THOMAS' UNOPPOSED
MOTION TO ALLOW COMPUTER ACCESS
FOR WORK PURPOSES

COMES NOW, Frederick Thomas, by and through his attorney, Maysoun Fletcher, Esq. with
The Fletcher Firm, P.C., and hereby files this Unopposed Motion seeking this Honorable Court's
permission to have a work issued computer.

Dated this 10th day of December, 2020

Respectfully Submitted,

/s/ Maysoun Fletcher
Maysoun Fletcher, Esq.
5510 S. Fort Apache Road
Las Vegas, NV. 89148
(702) 835-1542
Attorney for Frederick Thomas

1 **I. INTRODUCTION**

2 Mr. Thomas was placed on pre-trial release in this case on April 13, 2018. At the time of Mr.
 3 Thomas' initial pretrial release, he was nearing the completion of a 60-month prison sentence in the
 4 related Carder.su case, Case Number 2:12-cr-004-APG-GWF ("Carder.su"). Mr. Thomas began
 5 his 3-year term of supervised release in Carder.su on July 19, 2019, initially being released to a
 6 residential re-entry center in Florida around February, 2019. Since his release, he has been fully
 7 compliant and has worked diligently to be a model father, employee, partner, and citizen. On
 8 December 4, 2020, as a result of his outstanding behavior and reformation, the Court granted his
 9 request for early termination of supervised release in Carder.su.¹

11 Mr. Thomas is gainfully employed as a supervisor with Red-Bull. His employer is requiring
 12 him to have a company issued computer to work from home. His current pre-trial conditions
 13 prevent him from accessing a computer. ² Therefore, he seeks this Court's permission to have a
 14 computer for work purposes only.

16 Prior to filing this motion, undersigned counsel spoke with counsel for the United States, Kelly
 17 Pearson, and Mr. Thomas' Pretrial services officer, Jessie Moorehead, who each advised they do
 18 not oppose Mr. Thomas' request. As discussed with Ms. Pearson, he will provide access and his
 19 login credentials to pretrial services and only use the computer for work purposes.

21 **EMPLOYMENT**

22 Prior to his incarceration in Carder.su, Mr. Thomas worked for Red-Bull from July, 2013 until
 23 his self-surrender on March 20, 2015. He was re-hired by Red-Bull in March, 2019, while still at
 24 the residential re-entry center. Mr. Thomas has worked hard, with professionalism and humility
 25 and achieved several employee awards since his release. Due to his strong work ethic, he has been
 26

27 ¹ Please see Order [ECF 1715] and Motion [ECF 1714], Case No. 2:12-cr-004-APG-GWF.

28 ² Condition No. 54.

1 promoted twice since March, 2019. In June, 2019, he was promoted to Account Sales Manager
2 from Sales Trainee and in September of this year, he was promoted to Account Sales Manager
3 Lead. Currently, he is being considered for a District Manager position.

4 **II. LEGAL ARGUMENT**

5 Mr. Thomas' employer issued computer will not make him a danger to the community. The
6 allegations against Mr. Thomas in this case stem from alleged conduct in early 2011. Mr. Thomas
7 has since served a 60-month prison sentence and successfully completed his supervised release. He
8 is reformed from his alleged conduct in 2011. Moreover, he consents to pre-trial services having
9 access to the computer and will ensure they have his password and login credentials. He will also
10 only use the computer for work purposes.

11 **III. CONCLUSION**

12 For all the foregoing reasons, Mr. Thomas respectfully requests that this Honorable Court
13 amend condition number 54 to allow him to have access to a computer for work purposes only with
14 a special condition that pre-trial services be given his password and login credentials and access to
15 the computer.

16 Dated this 10th day of December, 2020.

17 Respectfully submitted,

18 /s/Maysoun Fletcher
19 Maysoun Fletcher, Esq.
20 Attorney for Frederick Thomas

21 IT IS SO ORDERED.

22 
23 _____
24 NANCY J. KOPPE
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: December 10, 2020